

## **REMARKS**

Applicant respectfully requests reconsideration of this application as amended.

Claims 1-5, 7-11, 14-18 and 21 have been amended. Claims 6, 12-13 and 19-20 have been cancelled without prejudice. No new claims have been added. Therefore, claims 1-5, 7-11, 14-18 and 21 are presented for examination.

## **Objection**

Claims 12-14 and 19-21 stand objected under 37 C.F.R. 1.75(c) as being in improper form because a multiple dependent claim must refer as an alternative only.

Claims 12-13 and 19-20 have been cancelled without prejudice which obviates the objection, which claims 14 and 21 no longer depend from a multiple dependent claim.

## **35 U.S.C. § 102 Rejection**

Claims 1-21 stand rejected under 35 U.S.C. §102(b) as being anticipated by Bekritsky, et al., U.S. Patent Publication No. 2002/0059535 (“Bekritsky”).

Applicants respectfully submit that Bekritsky discloses “*synchronizing internal clocks of receiving stations of a locating system . . . [and a] first arrival time is compared to a second arrival time to determine a correlated arrival time data . . . [and a] linear polynomial fit is computed as a function of the correlated arrival time data and the first and second arrival times.*” (Abstract).

In contrast, claim 1, as amended, in pertinent part, recites “synchronizing a second node timing model with a first node timing model, and further synchronizing the first and second node timing models with a global clock associated with the first node and the second node”. (emphasis provided). Although Bekritsky discloses *synchronizing*

*internal clocks of receiving stations*, it does not teach or reasonably suggest having a global clock to with a first and second timing models are synchronized (see claim 1). Having *synchronized internal clocks* does not equate having a global clock, associated with a first node and a second node, to which the first and second timing models are synchronized (see claim 1). Accordingly, Applicants respectfully request the withdrawal of the rejection of claim 1 and its dependent claims.

Claims 8 and 15 include limitations similar to those of claim 1. Accordingly, Applicants respectfully request the withdrawal of the rejection of claims 8 and 15 and their dependent claims.

### **Conclusion**

In light of the foregoing, reconsideration and allowance of the claims is hereby earnestly requested.

**Invitation for a Telephone Interview**

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

**Request for an Extension of Time**

Applicant respectfully petitions for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

**Charge our Deposit Account**

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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Date: February 23, 2006

  
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